

EXHIBIT S

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNIVERSAL LIFE CHURCH
MONASTERY STOREHOUSE, a
Washington non-profit corporation,
Plaintiff,

v.

MAURICE KING, LEWIS KING, GLEN
YOSHIOKA, DYLAN WALL, SARA
WHITE, and AMERICAN MARRIAGE
MINISTRIES, a Washington non-profit
corporation,

Defendants

AMERICAN MARRIAGE MINISTRIES,
Cross-Complainant/
Third-Party Plaintiff

v.

UNIVERSAL LIFE CHURCH
MONASTERY STOREHOUSE;
UNIVERSAL LIFE CHURCH/ULC
MONASTERY, INC., UNIVERSAL LIFE
CHURCH MONASTERY STOREHOUSE,
INC.,

Cross-Defendant/
Third-Party Defendants.

Case No. 2:19-CV-00301-RSL

**AMERICAN MARRIAGE MINISTRIES’
ANSWERS AND OBJECTIONS TO
PLAINTIFF’S REQUESTS FOR
ADMISSION TO DEFENDANT
AMERICAN MARRIAGE MINISTRIES**

The Honorable Robert S. Lasnik

**AMM’S ANSWERS AND OBJECTIONS TO PLAINTIFF’S
REQUESTS FOR ADMISSION TO DEFENDANT - 1**

Betts
Patterson
Mines
One Convention Place
Suite 1400
701 Pike Street
Seattle, Washington 98101-3927
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1 G. AMM objects to the extent the Requests summarize, re-characterize, or in fact
 2 mischaracterize facts relating to this case. By answering any of the Requests, AMM is not
 3 agreeing with any of ULC's factual statements, premises, or assertions or to the relevancy of any
 4 such matters.

5 Nothing set out in the specific objections below constitutes a waiver of these General
 6 Objections. Nothing contained in these responses and objections constitutes a waiver of any
 7 attorney-client privilege, work product protection, right or privacy or confidentiality, or any other
 8 applicable privilege, doctrine, or protection. Any privileged, protected, or confidential
 9 information inadvertently disclosed in AMM's responses to these Requests shall not be deemed a
 10 waiver of any such privilege, protection, or confidentiality. Discovery is ongoing and AMM
 11 reserves the right to supplement these responses at a later date.

12 **ANSWERS TO PLAINTIFF'S REQUESTS FOR ADMISSION**

13 **REQUEST FOR ADMISSION NO. 1:** Admit that what is attached hereto as Exhibit 1 is a true,
 14 correct, and complete copy of the The AMM-vs.-ULC Website.

15 **ANSWER:** AMM objects that the Request does not contain a temporal explanation or limitation.
 16 AMM also objects that it is vague and ambiguous what ULC considers is a "true, correct, and
 17 complete copy." Subject to and without waiving its objections, AMM responds as follows:
 18

19 Admit to the extent that Exhibit 1 is a true and correct copy of the textual content of
 20 the amm-vs-ulc.com website but otherwise deny.

21
 22 **REQUEST FOR ADMISSION NO. 2:** Admit that The AMM-vs.-ULC Website states "The
 23 Federal government recognizes AMM as 501(c)(3) tax exempt church"
 24
 25

1 DATED: AUGUST 16, 2019

Respectfully submitted,

2 By: /s/ Nancy V. Stephens

3 Nancy V. Stephens, WSBA #31510

4 By: /s/ Benjamin Hodges

5 Benjamin Hodges, WSBA #49301

6 By: /s/ Kelly A. Mennemeier

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16 By: /s/ Anne Cohen

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24 *Attorneys for Defendants*